IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant(s):   La Vaughn F. Watts, Jr.; Nobuyuki Albert Sato; Gary Douglas Huber

Assignee: Dell Products L.P.

Title: Combination Personal Data Assistant and Personal Computing System
                    Dynamic Memory Reclamation

Serial No.:	09/770,162	Filing Date:	January 26, 2003
Examiner:	Eugene Yun	Group Art Unit:	2682
Docket No.:	DC-02758	Customer No.:	33438

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Austin, Texas
September 21, 2006
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**PRE-APPEAL BRIEF REQUEST FOR REVIEW
AND STATEMENT OF REASONS**
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Sir:

      Applicant requests review of the Final Rejection in the above-identified application. No amendments are being filed with the request. This request is being filed with a Notice of Appeal. The following sets forth a succinct, concise, and focused set of arguments for which the review is being requested.

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CLAIM STATUS
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      Claims 1 – 27 are pending in the application. Claims 1 – 27 stand rejected under Mousseau, U.S. Patent No. 6,779,019 (Mousseau) in view of Dobson, U.S. Patent No. 6,891,887 (Dobson).

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REMARKS
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      The following remarks provide applicants' position regarding how the claims distinguish over the art of record. While not discussed herein, all the arguments presented regarding hindsight reconstruction and suggestion to combine are maintained.

The present invention generally relates to an architecture which includes a PC system and a PDA system which independently have access to a communication device, thereby allowing either system to communicate and receive messages regardless of the active state of the other system. Figure 4 shows an example of one such system in which the southbridge controller 110 of the PC and the PDA companion 205 of the PDA are coupled to a communication device 400.

Mousseau disclose pushing user-selected data items from a host system to a user's mobile communication device upon detecting the occurrence of one or more user-defined event triggers is provided. The user may then move the data items to a particular folder within a folder hierarchy stored in the mobile data communication device, or may execute some other system operation on the data item. Software operating at the mobile computer and the host system then synchronizes the folder hierarchy of the mobile device with a folder hierarchy of the host system, and any actions executed on the data items at the mobile device are then automatically replicated on the same data items stored at the host system.

More specifically, Mousseau discloses a host system 10 that is connected to a local area network 14. The local area network 14 is in turn connected to a wide area network 18. Mousseau further discloses that the mobile communication device 24 is also coupled to the wide area network 18 via a wireless gateway 20. The mobile data communication device 24 includes software that works with the redirector program 12 to enable redirection of user selected data items. (See generally, Mousseau, Col. 9, line 46 – col. 10, line 39.)

Dobson relates to local area networks (LANs) which are designed to operate within a home environment. More specifically, Dobson discloses a LAN adapter device which includes an interpolative equalizer. The LAN adapter device allows LAN computing devices to connect to a LAN medium.

When discussing Dobson, the Examiner sets forth:

> Mousseau does not teach the PC and the PDA capable of controlling the common communication device, but one of the PC and PDA controlling the common communication device at a given time. Dobson teaches the PC 540 (fig. 5) and the PDA 550 (fig. 5) capable of controlling the common communication device 560 or 570 (fig. 5), but one of the PC and PDA controlling the common communication device at a given time (see. col. 9, lines 62 - 67 and col. 10, lines 1 - 16 noting that a printer and copier can only perform one operation from one machine at a time). Therefore, it would have been obvious to one of ordinary skill in the art of the time the invention was made to provide to teachings of Dobson to said device of Mousseau in order to provide convenience in

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data sharing between various types of mobile devices. (Office Action dated January 25, 2006, Page 3, lines 3 – 10.)

The portion of Dobson to which the Examiner cites sets forth:

> FIG. 5 depicts a number of representative devices connected to DMT LAN 20 over a typical wire medium found in a residence or small business. Many of the wiring runs originate at a central node 500, which also connects to wiring 80 from the access infrastructure 10. It is understood that wiring 80 from the access infrastructure may connect at any other point to the shared medium. Other wiring runs may diverge into separate runs such as at nodes 502 and 504. Other runs may not be connected to any device and result in an unterminated wire pair such as nodes 506 and 508. Telephone 510 and fax machine 520 are standard POTS devices, whereas the remaining devices are connected to the DMT LAN 20 via a DMT LAN adapter device. Copier 570 has an internal DMT LAN adapter, while PDA 550, printer 560 and modem 530 use external DMT LAN adapters 515, 517, 519, respectively. PC 540 may have an internal (or external) DMT LAN adapter, a POTS modem, or both, connecting it to the local shared medium. (Dobson, Col. 9, lines 62 – 67 and Dobson, Col. 10, lines 1 – 12).

> PC 540 may communicate with, e.g., printer 560 or copier 570 over the DMT LAN while simultaneously communicating with an external device over access infrastructure 10 using an internal POTS modem (not shown). Dobson, Col. 10, lines 13 – 16.

The central node 500 of Dobson is not a common communication device which is coupled between a PC and a PDA as claimed. Note that Dobson does disclose a PC (e.g., PC 540) and a PDA device (e.g., PDA 550) coupled to a central node 500 via a corresponding external adapter 515. The central node is also coupled to a modem 530 as well as printers 560 and 570. The modem 530 is coupled to the central node 500 via an external adapter 519. The printer 560 is coupled to the central node 500 via an external adapter 517.

Dobson does not disclose or suggest a common communication device which is coupled to a PC and a PDA as claimed, much less a common communication device where the PC and the PDA are capable of controlling the common communication device, but one of the PC and the PDA controlling the common communication device at a given time. These deficiencies of Dobson are not fulfilled by Mousseau.

More specifically, Mousseau and Dobson do not teach or suggest a mobile computing system which includes a common communication device, a personal computing system (PC) coupled to the common communication device, a PDA coupled to the communication device, where *the storage device of the PC synchronizes messages received from the common communication device with the storage device of the PDA*, and where *the PC and the PDA are*

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capable of controlling the common communication device, but one of the PC and the PDA controlling the common communication device at a given time, all as required by independent claim 1. Accordingly, claim 1 is allowable over Mousseau and Dobson. Claims 2 – 7 depend from claim 1 and are allowable for at least this reason.

Mousseau and Dobson do not teach or suggest a mobile computing system which includes a common communication device, a personal computing system (PC) coupled to the common communication device, and a personal digital assistant system (PDA) coupled to the common communication device where *the PDA is capable of receiving messages through the common communication device and synchronizing the messages received through the common communications device with the PC* and *where the PC and the PDA are capable of controlling the common communication device, but one of the PC and the PDA controlling the common-communication device at a given time*, all as required by independent claim 8. Accordingly, claim 8 is allowable over Mousseau and Dobson. Claims 9 – 11 depend from claim 8 and are allowable for at least this reason.

Mousseau and Dobson do not teach or suggest a method of clearing and archiving messages in a dual system computer architecture which includes a first computer system coupled to a common communication device and a second computer system coupled to a common communication device, *the first computer system and the second computer system are capable of controlling the common communication device with one of the first computer system and the second computer system controlling the common communication device at a given time*, much less such a method which includes receiving and storing messages by the first computer system to a first memory device, synchronizing the messages with the second computer system, whereby the second computer system archives synchronized messages to a second memory device, and *deleting synchronized and archived messages whenever the first memory device is filled*, all as required by independent claim 12. Accordingly, claim 12 is allowable over Mousseau and Dobson. Claims 13 – 15 depend from claim 12 and are allowable for at least this reason.

Mousseau and Dobson do not teach or suggest a method of clearing and archiving messages in a dual system computer architecture which includes a first computer system coupled to a *common* communication device and a second computer system coupled to the *common* communication device, *the first computer system and the second computer system are capable of controlling the common communication device with one of the first computer system and the*

second computer system controlling the common communication device at a given time, much less such a method which includes receiving and storing messages by the first computer system to a first memory device, synchronizing the messages with a second computer system, whereby *the second computer system archives synchronized messages to a second memory device, and informing a user whenever the first memory device is filled*, all as required by independent claim 16. Accordingly, claim 16 is allowable over Mousseau and Dobson. Claims 17 – 27 depend from claim 16 and are allowable for at least this reason.

In view of the arguments set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, please telephone the undersigned.

I hereby certify that this correspondence is being electronically submitted to the COMMISSIONER FOR PATENTS via EFS on September 21, 2006.

/Stephen A. Terrile/
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Respectfully submitted,

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